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Via ECF
Via Messenger

January 22, 2015

The Hon. Laura Taylor Swain
United States District Judge
United States District Court
500 Pearl Street
New York, NY 10007

Re: *Universitas Education, LLC v. Nova Group, Inc.*, Case No. 11-1590-LTS-HBP (S.D.N.Y.)

Dear Judge Swain:

We represent Petitioner/Judgment Creditor Universitas Education, LLC ("Universitas") in the above-captioned action, and write in regards to a Stipulation and Proposed Protective Order that we respectfully request the Court to enter.

The Stipulation and Proposed Protective Order is between Universitas, the Grist Mill Trust Welfare Benefit Plan, the Sickness, Accident, Disability Indemnity Trust 2005, Molly Carpenter, Life Insurance Company of the Southwest, and National Life Insurance Company. It seeks to protect confidential information in documents that non-parties Life Insurance Company of the Southwest and National Life Insurance Company will be producing to Universitas pursuant to a subpoena dated November 26, 2014.

With the consent of counsel for the above-mentioned entities, we respectfully request that the Court "so-Order" the attached Stipulation and Proposed Protective Order.

Very truly yours,

A handwritten signature in cursive script that reads "Paula K. Colbath" followed by a stylized monogram.

Paula K. Colbath
Partner

Attachment

cc: Dan E. LaBelle (counsel for Molly Carpenter, the Grist Mill Trust Welfare Benefit Plan, and the Sickness, Accident, Disability Indemnity Trust 2005) (via ECF)
Christopher B. Zimmerman (counsel for Life Insurance Company of the Southwest and National Life Insurance Company) (via email)